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14 THOMSON, INC.

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 TECHNOLOGY LICENSING ) Case No. CIV S-03-1329 WBS PAN  
18 CORPORATION, a Nevada Corporation, )  
19 and )

20 AV TECHNOLOGIES LLC  
21 Plaintiffs, )

22 vs. )

23 THOMSON, INC., a Delaware )  
24 Corporation )  
25 Defendant. )

26 **[PROPOSED] ORDER RE JOINT MOTION FOR**  
27 **ENTRY OF JUDGMENT**

28 **JURY DEMANDED**

29 **Date:** \_\_\_\_\_

30 **Time:** \_\_\_\_\_

31 **Judge: Hon. William B. Shubb**

32 **ORDER**

33 The Court has fully considered the Joint Motion of Plaintiffs, Technology Licensing  
34 Corporation (“TLC”) and AV Technologies LLC (“AVT”), and Defendant, Thomson, Inc.  
35 (“Thomson”), to stay all of Thomson’s counterclaims, to the extent that such counterclaims still

1 exist in this case, relating to U.S. Patent Numbers 5,495,524 and 4,573,070 (the "Joint Motion")  
2 as well as all pleadings and evidence submitted by the parties on the Joint Motion.

3  
4 In earlier proceedings, the Court heard motions by Thomson for summary judgments on  
5 Plaintiffs' infringement and damages claims (Doc. ##100, 106, 113, 123 and 128). The Court  
6 granted summary judgment in Thomson's favor on these motions on June 30, 2005 (Doc. #170)  
7 and July 22, 2005 (Doc. #183).

8 The Court has found that there is no just reason to delay entry of judgment on the claims  
9 for which summary judgment has been granted. Therefore, the Joint Motion is GRANTED.

10 IT IS HEREBY ORDERED that:

11 (a) pursuant to FED. R. CIV. P. 54(b), the Court orders and directs the Clerk to enter a  
12 final judgment, on a separate document complying with FED. R. CIV. P. 58, as  
13 follows:  
14

15 On Plaintiffs' Count in their Amended Complaint for Patent Infringement  
16 by Thomson, Inc. of U.S. Patent No. 5,495,524 and U.S. Patent No.  
17 4,573,070, judgment is entered in favor of Thomson, Inc., based upon the  
18 Court's June 30, 2005 Order and the Court's July 22, 2005 Order, and  
plaintiffs Technology Licensing Corporation and AV Technologies LLC  
shall take nothing on that count.

19 (b) all proceedings between Plaintiffs, TLC and AVT, and Defendant, Thomson, with  
20 respect to Thomson's counterclaims, to the extent that such counterclaims still  
21 exist in this case, relating to U.S. Patent Numbers 4,573,070 (the '070 Patent) and  
22 5,459,524 (the '524 Patent) are stayed in this proceeding, Case No. CIV S-03-  
23 1329, until further Order from this Court.  
24  
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1 This stay shall only apply to Thomson's pending counterclaims, to the extent that such  
2 counterclaims still exist in this case. This stay shall not apply to any filing of any motions by  
3 Thomson for a finding of an exceptional case, attorneys' fees, and/or for bill of costs and the  
4 filing of any request for further relief. Plaintiffs will retain the ability to file motions and/or  
5 oppositions concerning any motions initiated by Thomson pursuant to this Order.  
6

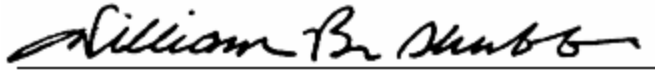
7 This stay does not include those portions of the case which were previously severed and  
8 stayed by the Court's September 7, 2004 Order.

9 This stay shall be effective until further Order of the Court upon motion from either party  
10 to lift this stay.  
11

12 All dates in the Court's July 15, 2005 Final Pretrial Order are hereby vacated.  
13

14 IT IS SO ORDERED:

15 Dated: July 29, 2005

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17 WILLIAM B. SHUBB  
18 UNITED STATES DISTRICT JUDGE  
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